

## **REMARKS**

### **Introduction**

Claims 1, 11, and 21 have been amended. The application continues to include claims 1-21 and 25.

Applicants thank the Examiner for taking the time to conduct a personal interview with the Applicants' representative on March 19, 2009.

Reconsideration of the rejection is respectfully requested in view of the claim amendments and following remarks.

### ***Claim Objections***

Claims 11 and 21 were objected to for having informalities. Applicants respectfully submit that the amendments to claims 11 and 21 correct any alleged informalities and that the objections are now moot.

### ***Rejections under 35 U.S.C. § 101***

Claim 21 was rejected as allegedly directed to non-statutory subject matter. Applicants submit that the amendment of claim 21 renders this rejection moot. The claim is directed to a computer with a memory having means suitable for carrying out the stated functions.

### ***Rejections under 35 U.S.C. § 112, First Paragraph***

Claims 1-21 and 25 were rejected as allegedly failing to comply with the written description requirement. Applicants have removed the offending

limitation. Applicants respectfully submit that the amendments to claims 1, 11 and 21 render this rejection moot.

***Rejections under 35 U.S.C. § 103***

Claims 1-21 and 25 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over W3C, "XML Path Language (XPath)" and "XSL Transformation (XSLT)" Version 1.0, *W3C Recommendation*, November 16, 1999 (hereinafter "W3C") in view of Renner et al. (U.S. Pat. No. 6,993,657; hereinafter "Renner"). This rejection is traversed with respect to the amended claims.

**The Prior Art does not teach executing statements in accordance with dependencies based on a reference to the second data processing cell in the formula.**

One embodiment of the invention is a system for cell based data processing in accordance with an execution flow description. Data processing cell specifications specify a plurality of statements (e.g., a formula) in a data processing cell. Sometimes a first data processing cell may be dependent upon information in a second data processing cell. Accordingly, an embodiment analyzes the first data processing cell, determines its dependencies, and generates execution flow descriptors that specify how the data processing cells should be executed. Thus, in a first data processing cell, a dependency on another cell may result in processing statements in the data processing out of order. Instead of executing the data processing cell "as-is," the statements are

executed in accordance with an order specified by the execution flow descriptors.

See, e.g., page 14, lines 8-23 of the patent application.

In contrast with this embodiment, applicants respectfully submit that the prior art does not teach or suggest to:

“receive at execution time, a data processing specification having a first and a second data processing cell specification, unnested with respect to each other, specifying a first and a second data processing cell, with each data processing cell specification having a plurality of statements including a formula specifying an action or computation, the first data processing cell having a data dependency on the second data processing cell **based on a reference to the second data processing cell in the formula that requires computation of the second data processing cell to evaluate the formula**” (Amended Claim 1, emphasis added)

Applicants respectfully submit that neither W3C nor Renner teaches or suggests this limitation because neither reference teaches or suggests data processing cells having formulas that require a second data processing cell to be evaluated first in order to compute the formula. With resolving these dependencies, the formula may be computed incorrectly.

This limitation is recited by claim 1; claims 11 and 21 recite similar limitations. For at least these reasons, amended claims 1, 11, and 21 should now be allowable over the cited prior art. The remaining claims depend from either claim 1, 11 or 21, and should also be allowable for at least the above reasons.

### **Conclusion**

Applicants respectfully request favorable action in connection with this application. The Examiner is invited and urged to contact the undersigned to discuss any matter concerning this application. No fee is believed to be due for this submission. Should a fee be required, the Commissioner is authorized to charge any such fee to Womble Carlyle's Deposit Account No. 09-5028.

Respectfully Submitted,

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